

November 2, 2006

### **Important Reminder**

Details regarding regular meetings of the Citizen's Ethics Advisory Board are always available on the OSE's Web site. Dates, times and locations of these meetings are currently posted from now through September 2007. Additionally, as soon as possible prior to each meeting date, the agenda is posted on the site. Bookmark [Board Meeting Schedule](#) to always have this information on hand.

### **New Advisory Opinion**

On October 31, 2006, the Citizen's Ethics Advisory Board met and decided on one new advisory opinion, summarized below. Click on the AO number to read the full text of the opinion.

#### [2006-7](#)

Under the Code of Ethics, DOT employees who work at the Bradley International Airport may accept certain state-subsidized discounts on food and non-alcoholic beverages from airport vendors. Per the specific terms of the contracts in place, DOT bears the entire cost of the discounts made available to its employees. Therefore, consideration of equal value is given and the discount does not meet the definition of a "gift" under General Statutes § 1-79 (e).

### **Vote on Advisory Opinion 2006-3 (Gifts to the State)**

At the same open meeting, the Citizen's Ethics Advisory Board did not pass the draft of the amended Advisory Opinion 2006-3, which deals with gifts to the state from regulated donors. Please note that absent a formal amendment, the original interpretation of § 1-84 (q) as found in [Advisory Opinion No. 2006-3](#) still holds.

### **Frequently Asked Question of the Month**

#### *Government Rates at Hotels*

**Q:** If a state employee travels on non-government business (e.g., a two-week vacation with her family) and receives a government employee discount rate at the hotel amounting to more than \$100, is this a violation of the Code? (This question assumes the hotel offering the discount is a non-regulated donor. Non-regulated donors may give state employees up to \$100 per year in gifts.)

**A:** If this discount is only available to government entities and offered by a non-regulated donor, the state employee may accept it only up to \$100. It would constitute a "use of office" for the employee to accept this discount if it is more than \$100 because it is given to him or her by virtue of his or her state position. See [Advisory Opinion No. 1998-9](#).

**Q:** Would the above scenario ever constitute a discount or promotional item available to the general public (i.e., be one of the gift exceptions) under Conn. Gen. Stat. § 1-79 (e) (7) and therefore be permissible at any value, even from a regulated donor, as it would not meet the definition of "gift"?

**A:** Even though this is called a "government discount," if it is the same discount that is offered to other large groups such as AAA or AARP, then it may be considered a "discount available to the general public." General Statutes § 1-79 (e) (7). As such, this discount may be accepted and is not subject to a monetary limit.

Note that it is not appropriate to analyze the discount on a per-day basis if the individual is paying one bill at the end of a multi-day stay. Please contact the Office of State Ethics Legal Division (860-566-4472; [Ethics.Code@ct.gov](mailto:Ethics.Code@ct.gov)) for further information on this topic or to request advice involving a specific scenario.

To submit a question to be addressed in this electronic forum or on the OSE's Web site, please e-mail the question to [Meredith.Trimble@ct.gov](mailto:Meredith.Trimble@ct.gov).

Sincerely,

Meredith Trimble  
Director of Education  
Office of State Ethics